

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

RACHEL KATZMANN

(b) County of Residence of First Listed Plaintiff Philadelphia
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Mary Kramer, Esq.; Murphy Law Group, LLC; Eight Penn
Center, Suite 2000, 1628 John F. Kennedy Blvd.,
Philadelphia, PA 19103: 267-273-1054

DEFENDANTS

ARCTIC GLACIER U.S.A., INC.

County of Residence of First Listed Defendant Montgomery
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Stephanie Kaplan

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability		PROPERTY RIGHTS	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	LABOR	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 710 Fair Labor Standards Act	SOCIAL SECURITY	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/Exchange
		<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights		FEDERAL TAX SUITS	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	IMMIGRATION	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input checked="" type="checkbox"/> 442 Employment	<input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 465 Other Immigration Actions		<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment			<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other			
	<input type="checkbox"/> 448 Education			
		PRISONER PETITIONS		
		Habeas Corpus:		
		<input type="checkbox"/> 463 Alien Detainee		
		<input type="checkbox"/> 510 Motions to Vacate Sentence		
		<input type="checkbox"/> 530 General		
		<input type="checkbox"/> 535 Death Penalty		
		Other:		
		<input type="checkbox"/> 540 Mandamus & Other		
		<input type="checkbox"/> 550 Civil Rights		
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 U.S.C. § 12101, et seq.Brief description of cause:
DISCRIMINATION AND RETALIATION

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

Nov 17, 2023

SIGNATURE OF ATTORNEY OF RECORD

/s/ Mary Kramer

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 216 W Mount Pleasant Avenue, Philadelphia, PA 19119.

Address of Defendant: One Bala Plaza, Suite 622, Bala Cynwyd, PA 19004

Place of Accident, Incident or Transaction: One Bala Plaza, Suite 622, Bala Cynwyd, PA 19004

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 11/17/2023 Mary Kramer 324078
Digitally signed by Mary Kramer
DN: CN = Mary Kramer email =
mkramer@phillyemploymentlawyer.com C = US O =
Mary Kramer
Date: 2023.11.17 15:35:35 -05'00'
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- | | |
|-------------------------------------|-----------------------------------------------------------------|
| <input type="checkbox"/> | 1. Indemnity Contract, Marine Contract, and All Other Contracts |
| <input type="checkbox"/> | 2. FELA |
| <input type="checkbox"/> | 3. Jones Act-Personal Injury |
| <input type="checkbox"/> | 4. Antitrust |
| <input type="checkbox"/> | 5. Patent |
| <input type="checkbox"/> | 6. Labor-Management Relations |
| <input checked="" type="checkbox"/> | 7. Civil Rights |
| <input type="checkbox"/> | 8. Habeas Corpus |
| <input type="checkbox"/> | 9. Securities Act(s) Cases |
| <input type="checkbox"/> | 10. Social Security Review Cases |
| <input type="checkbox"/> | 11. All other Federal Question Cases |

(Please specify): _____

B. Diversity Jurisdiction Cases:

- | | |
|--------------------------|--------------------------------------------------|
| <input type="checkbox"/> | 1. Insurance Contract and Other Contracts |
| <input type="checkbox"/> | 2. Airplane Personal Injury |
| <input type="checkbox"/> | 3. Assault, Defamation |
| <input type="checkbox"/> | 4. Marine Personal Injury |
| <input type="checkbox"/> | 5. Motor Vehicle Personal Injury |
| <input type="checkbox"/> | 6. Other Personal Injury (Please specify): _____ |
| <input type="checkbox"/> | 7. Products Liability |
| <input type="checkbox"/> | 8. Products Liability – Asbestos |
| <input type="checkbox"/> | 9. All other Diversity Cases |

(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Mary Kramer, Esq., counsel of record or pro se plaintiff, do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE: 11/17/2023 Mary Kramer 324078
Digitally signed by Mary Kramer
DN: CN = Mary Kramer email =
mkramer@phillyemploymentlawyer.com C =
US O = Philly Law Firm LLC
Date: 2023.11.17 15:35:35 -05'00'
Attorney-at-Law / Pro Se Plaintiff Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RACHEL KATZMANN
216 W Mount Pleasant Avenue
Philadelphia, PA 19119

Plaintiff,

v.

ARCTIC GLACIER U.S.A., INC.
One Bala Plaza, Suite 622
Bala Cynwyd, PA 19004

Defendant.

Civil Action No.: _____

JURY TRIAL DEMANDED

COMPLAINT – CIVIL ACTION

Plaintiff, Rachel Katzmman (“Plaintiff”), by and through her undersigned counsel, for her Complaint against Arctic Glacier U.S.A., Inc. (“Defendant”), alleges as follows:

INTRODUCTION

1. Plaintiff initiates this action contending Defendant violated the American with Disabilities Act (“ADA”), 42 U.S.C. § 12101, *et seq.*, by failing to provide reasonable accommodations to Plaintiff; failing to engage in the interactive process; and terminating Plaintiff because of her actual and/or perceived disability, because Defendant regarded her as being disabled, for her past record of impairment, and in retaliation for requesting a reasonable accommodation in connection thereto, in violation of the ADA.¹

¹ Plaintiff intends to amend this Complaint to add claims under the Pennsylvania Human Relations Act (“PHRA”), 43 P.S. § 951, *et seq.*, upon administrative exhaustion.

PARTIES

2. Plaintiff is a citizen of the United States and Pennsylvania and currently maintains a residence at 216 W Mount Pleasant Avenue, Philadelphia, PA 19119.

3. Upon information and belief, Defendant is a for-profit company organized and existing under the laws of the State of Delaware with a registered office address and places of business located at One Bala Plaza, Suite 622, Bala Cynwyd, PA 19004.

JURISDICTION AND VENUE

4. Paragraphs 1 through 3 are hereby incorporated by reference as though the same were fully set forth at length herein.

5. On or about November 23, 2022, Plaintiff filed a Charge of Discrimination with the United States Equal Employment Opportunity Commission (“EEOC”), which was dual-filed with the Pennsylvania Human Relations Commission (“PHRC”), thereby satisfying the requirements of 42 U.S.C. § 2000e5(b) and (e). Plaintiff’s EEOC charge was docketed as EEOC Charge No. 530-2023-01412. Plaintiff’s EEOC charge was filed within one-hundred and eighty (180) days of the unlawful employment practice.

6. By correspondence dated August 25, 2023, Plaintiff received a Notice of Right to Sue from the EEOC regarding her Charge, advising her that she had ninety (90) days to file suit against Defendant.

7. Plaintiff filed the instant action within the statutory time frame applicable to her claims.

8. Plaintiff has therefore exhausted her administrative remedies and has complied with all conditions precedent to maintaining this action.

9. This action is authorized and initiated pursuant to the American with Disabilities Act (“ADA”), 42 U.S.C. § 12101, *et seq.*

10. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1343 as well as it is a civil rights action arising under the laws of the United States.

11. The venue in this district is proper pursuant to 28 U.S.C. § 1391(b), as Defendant resides in this judicial district and does business herein, and the unlawful practices of which Plaintiff is complaining were committed in this judicial district.

FACTUAL ALLEGATIONS

12. Paragraphs 1 through 11 are hereby incorporated by reference as though the same were fully set forth at length herein.

13. Plaintiff began her employment with Defendant on or about April 5, 2021, as a Contractor; Plaintiff was later hired for full-time employment on or about September 19, 2021, in the position of Talent Acquisition Specialist.

14. As a Talent Acquisition Specialist, Plaintiff worked directly for Defendant’s Vice President of Recruiting and Talent Development, Thomas Gasque (“Mr. Gasque”), and provided him with any assistance he required.

15. In her position, Plaintiff also managed contract recruiters and personally handled recruiting.

16. Notably, Mr. Gasque frequently asked Plaintiff to work outside of normal business hours and beyond her assigned responsibilities.

17. However, Plaintiff always completed the assignments from Mr. Gasque without complaint, as well as without receiving any additional compensation.

18. In or around February 2022, due to a workload that was overburdened by Mr. Gasque's frequent requests, which Plaintiff handled on top of her responsibilities as a Talent Acquisition Specialist, Plaintiff's health began to decline.

19. Specifically, Plaintiff had previously been diagnosed with anxiety disorder, which resulted in a sleep disorder, both of which constitute disabilities within the meaning of the ADA and PHRA in that they severely limit one or more major life activities.

20. As a result of her disabilities, which were exacerbated due to her work conditions, Plaintiff emailed Mr. Gasque on May 18, 2022, to explicitly request a reasonable accommodation; Plaintiff's request focused on her needs related to her anxiety disorder.

21. Specifically, Plaintiff requested the following: a clear set of core hours during which Plaintiff would need to be available and at her computer; a clarified system for requesting time off or needing to take time off when unexpectedly ill; a scheduled daily check-in phone call between Mr. Gasque and Plaintiff; and a weekly written task list, similar to the structure used by the Zendesk ticketing system.

22. It should be noted that these accommodations would not have imposed an undue hardship on Defendant as they required neither significant difficulty or expense.

23. Also on or about May 18, 2022, Plaintiff shared her request for a reasonable accommodation with Defendant's then Human Resources Business Partner, Jacky Syberg ("Ms. Syberg").

24. On or about May 19, 2022, Ms. Syberg thanked Plaintiff for letting her know and confirmed that she had spoken with Mr. Gasque the day before and that he had given her "a heads up," which acknowledged that Defendant was fully aware of Plaintiff's request.

25. Additionally, Mr. Gasque informed Plaintiff that Defendant's Vice President of Payroll, Benefits, HRIS, and Compensation, Judy O'Brien ("Ms. O'Brien"), would reach out to her to provide information on what would be needed to start the ADA process.

26. Plaintiff did not hear from Ms. O'Brien until on or about May 23, 2022, at approximately 10:27 AM, at which time Ms. O'Brien provided Plaintiff with a number to call to discuss accommodations.

27. That same day, May 23, 2022, Plaintiff requested a meeting with Mr. Gasque and Defendant's Chief Human Resources Officer, Elise Doyle ("Ms. Doyle"), to discuss her request for accommodations.

28. However, this meeting was instead used for Ms. Doyle to surprise Plaintiff with alleged deficiencies in her job performance.

29. Defendant's issues with Plaintiff's performance were not revealed to her until after she requested a reasonable accommodation for her disabilities.

30. Following this meeting, Plaintiff was given a "Final Written Warning," which outlined the alleged faults with her job performance.

31. Again, this warning was not given to Plaintiff until after her request for an accommodation was made.

32. Given the fact that Plaintiff was the person to schedule this meeting for the purpose of discussing her accommodation request, Plaintiff was understandably caught off guard when presented with an attack on her job performance.

33. During the on or about May 23, 2022, meeting, Ms. Doyle took it upon herself to explain to Plaintiff her understanding of the purpose of the ADA.

34. Indeed, Ms. Doyle advised that, in her understanding, the ADA is meant for individuals with limited physical ability who might need a reasonable accommodation, such as a wheelchair.

35. Moreover, Ms. Doyle went on to tell Plaintiff that she did not understand why she, in her position as Talent Acquisition Specialist, needed the specific accommodations she asked for.

36. Lastly, Ms. Doyle explicitly told Plaintiff that she felt that the accommodations Plaintiff requested were unreasonable.

37. Following the meeting, on or about June 2, 2022, Ms. Doyle emailed Plaintiff to remind her that it was the company's busy season and there was a need for weekly meetings to identify "hot areas to recruit."

38. Furthermore, Ms. Doyle told Plaintiff that they needed to "focus [her] priorities" after each meeting.

39. By doing so, Ms. Doyle went on to twist the comments made by Plaintiff about her disabilities and her need for a reasonable accommodation, and what the accommodation would be.

40. Egregiously, Ms. Doyle made a point of mentioning raises that Plaintiff had previously received, with the implication that she did not think they were deserved, and that they surely were not deserved now that Plaintiff had asked for an accommodation.

41. Then, on or about June 10, 2022, Plaintiff was informed that her employment with Defendant was being terminated due to job performance.

42. However, when considering that Plaintiff had received a raise in March 2022, and a second raise in April 2022, a termination based on job performance does not appear likely, even

more so when considering Plaintiff never received any type of formal written warning for job performance prior to her May 18, 2022, request for a reasonable accommodation.

43. As such, Defendant failed to reasonably accommodate Plaintiff's disabilities and failed to engage in the interactive process to determine such reasonable accommodations.

44. It is believed and therefore averred Defendant terminated Plaintiff's employment because of her actual and/or perceived disabilities, because Defendant regarded her as being disabled, for her past record of impairment, and in retaliation for her request(s) for an accommodation in connection thereto, in violation of the ADA.

45. As a result of Defendant's deliberate, willful, malicious, and unlawful actions, Plaintiff has suffered damages, including, but not limited to, loss of employment, promotion benefits, earnings and earnings potential, loss of potential benefits, and other economic damages, and has also suffered mental anguish, emotional pain and suffering, emotional distress, humiliation, and damage to reputation.

COUNT I
AMERICANS WITH DISABILITIES ACT
42 U.S.C. § 12101, *et seq.*
DISCRIMINATION AND RETALIATION

46. Paragraphs 1 through 45 are hereby incorporated by reference as though the same were fully set forth at length herein.

47. At all times relevant hereto, Plaintiff was an employee within the meaning of the Americans with Disabilities Act ("ADA"), 42 U.S.C. § 12101, *et seq.*

48. Pursuant to the ADA, Plaintiff is a qualified individual with one or more disabilities.

49. Plaintiff's anxiety and sleep disorders substantially limited her ability to engage in one or more major life activities for an extended period of time.

50. Defendant was aware of Plaintiff's disabilities and/or regarded Plaintiff as being disabled.

51. Despite her disabilities, Plaintiff would have been able to perform the essential functions of her job, with or without a reasonable accommodation.

52. By reasons of the foregoing, Defendant, through its agents, officers, servants, and/or employees, has violated the ADA by failing to engage in the interactive process to determine and consider reasonable accommodations for Plaintiff, by failing to provide reasonable accommodations to Plaintiff, and by terminating Plaintiff's employment because of her actual and/or perceived disabilities, because Defendant regarded her as being disabled, for her past record of impairment, and/or for her request(s) for reasonable accommodations in connection to her disabilities.

53. As a result of Defendant's deliberate, unlawful, and malicious actions as set forth above, Plaintiff has suffered loss of employment, earnings, raises, other significant economic benefits, emotional pain and suffering, emotional distress, damage to reputation, and humiliation.

WHEREFORE, as a result of the unlawful conduct of Defendant, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendant, and grant her the maximum relief allowed by law, including, but not limited to:

A. Back wages, front pay, and bonuses in an amount to be determined at trial, but not less than one hundred and fifty thousand dollars (\$150,000.00);

B. Punitive, compensatory, and/or exemplary damages in an amount to be determined at trial, but sufficient to punish Defendant for its intentional, negligent, willful, wanton, and/or malicious conduct;

- C. Plaintiff's costs, disbursements, and attorney's fees incurred in prosecuting this matter;
- D. Pre-judgment interest in an appropriate amount;
- E. Such other and further relief as is just and equitable under the circumstances; and
- F. Any verdict in favor of Plaintiff is to be molded by the Court to maximize the financial recovery available to Plaintiff in light of the caps on certain damages set forth by applicable federal law.

JURY DEMAND

Plaintiff hereby demands a trial by jury as to all issues so triable.

Respectfully submitted,

MURPHY LAW GROUP, LLC

By: /s/ Mary Kramer, Esq.
Mary Kramer, Esq.
1628 John F. Kennedy Blvd., Suite 2000
Philadelphia, PA 19103
Phone: (267) 273-1054
Fax: (215) 525-0210
mkramer@phillyemploymentlawyer.com
Counsel for Plaintiff

Dated: November 17, 2023

DEMAND TO PRESERVE EVIDENCE

The Defendant is hereby demanded to preserve all physical and electronic information pertaining in any way to Plaintiff's employment, to her potential claims and her claims to damages, to any defenses to same, including, but not limited to electronic data storage, employment files, files, memos, job descriptions, text messages, e-mails, spreadsheets, images, cache memory, payroll records, paystubs, time records, timesheets, and any other information and/or data which may be relevant to any claim or defense in this litigation.